



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 2023

VIA EMAIL

angelat0763@gmail.com
swmi4liberty@be-innovative.net

Angela Thorton
15223 Ripple Dr.
Linden MI, 48451

RE: MUR 8130

Dear Ms.Thorton:

The Federal Election Commission (FEC) received a complaint that indicates you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 8130. Please refer to this number in all future correspondence.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against you in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share any information you provide with other law enforcement agencies, including the Department of Justice.¹ While the matter remains open, it will remain confidential as set forth above. After the matter is closed, certain documents from the file will be made available to the public on the Commission's website. To learn more about the agency's disclosure policy, please see 81 Fed. Reg. 51, 702 (Aug. 2, 2016), <https://fec.gov/resources/cms-content/documents/notice2016-06.pdf>.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents,

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

records, and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

Any correspondence sent to the Commission, such as a response, must be addressed to **one** of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail
Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Trace Keeys, Paralegal
1050 First Street, NE
Washington, DC 20463

OR

Email
cela@fec.gov

As indicated in the FEC's Notice found at <https://www.fec.gov/legal-resources/enforcement/complaints-process/how-to-file-complaint-with-fec/>, the FEC has largely resumed normal mail operations, but please be advised that processing paper correspondence may be delayed. Accordingly, we strongly encourage you to file responses and additional correspondence via email.

If you have any questions, please contact Trace Keeys at (202) 694-1260. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Wanda D. Brown
Acting Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosures:

1. Complaint
2. Procedures
3. Designation of Counsel

April 18, 2023

VIA EMAIL, REGULAR MAIL, AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

Federal Election Commission
1050 First Street, NE
Washington, DC 20463
Email: EnfComplaint@fec.gov

MUR 8130

Re: Violation Under 52 U.S.C. §30109

Dear Sir/Madam:

I am writing as National Chair of the national Libertarian Party ("NLP") regarding a complaint of a violation under 52 U.S.C. §30109. The attached Amended Statements of Organization for the Libertarian Party of Michigan Executive Committee, Inc. dated February 5, 2023, and March 19, 2023, (*attached hereto as composite Exhibit A*), filed and certified by Angela Canny are knowingly and demonstrably false.

PERTINENT FACTS

The Libertarian Party of Michigan Executive Committee, Inc. is the governing body of the Libertarian Party of Michigan, a chartered state-level affiliate party of the NLP (collectively "LPMI"). The Commission issued Advisory Opinion 2016-7 (*attached hereto as Exhibit B*), concluding that this Committee qualifies as a state committee of a national political party.

In early February 2023, a group of persons started fraudulently representing themselves to be the valid leadership of LPMI, including Angela Canny. On February 16, 2023, the NLP sent a cease and desist letter to the persons making this illegitimate claim making it clear that they did not represent the chartered state-level affiliate, and identifying the actual recognized affiliate as chaired by Andrew Chadderdon (*see letter attached hereto as Exhibit C*). Also, on February 15, 2023, an attorney for the legitimate leadership of LPMI also sent a cease and desist to the non-recognized group (*see letter attached hereto as Exhibit D*). The illegitimate group had appeal rights under the NLP which they failed to exercise by the deadline of March 18, 2023, and in fact filed one of the false Amended Statement of Organizations after that fact.

The NLP would also note that the false paperwork indicates that the website of the organization is michiganlp.net. On the official website of the NLP (*see <https://www.lp.org/state-affiliates/>*) the website of the recognized chartered state level affiliate is listed correctly as michiganlp.org.

FEC
4/18/23
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CLAIMED VIOLATIONS

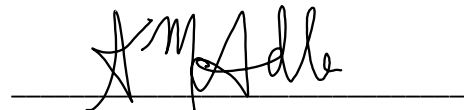
As stated in its Advisory Opinion 2016-7, one of the prongs in determining qualifications of a state committee of a national political party is whether or not the state party organization is part of the official structure of a national party. While there does exist a valid chartered state-level affiliation in Michigan with Andrew Chadderdon as its Chair and Greg Black as its treasurer, Angela Canny is not the treasurer or authorized representative of that organization with any authority to file documents on its behalf.

The illegitimate group has been actively fundraising using this impersonation, including potentially for federal candidates. Further, the money is not being deposited under own name, but under that of yet another group and in a different account than that identified in the filings.

REQUESTED RELIEF

The actions of Angela Canny have been done in complete knowledge of these facts and in bad faith. The NLP requests these false documents be stricken and appropriate fines be levied and any other such relief that the Commission deems is appropriate.

We note that Greg Black is the newly elected Treasurer of the recognized affiliate but has not yet filed this change with the Commission due to these false filings and is awaiting guidance from the Commission via this Complaint.



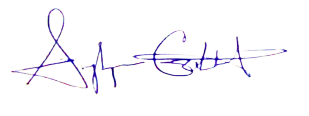
Angela McArdle, Libertarian Party National Chair
7200 Thannas Way
Austin TX 78744

State of Texas

County of Harris

Sworn to and signed before me on the 18th day of April, 2023, by

Angela McArdle (name of principal signer).



(seal) Notary Public Signature



THIS NOTARIAL ACT WAS AN ONLINE NOTARIZATION